## Jessica Mugler

From: Robert Anthony Alvarez <ralvarez@avantilaw.com>

Sent: Friday, May 30, 2025 7:51 AM

To: Jessica Mugler

Cc: Kenya K. Davis; Kat D; Teresa Hendricks

**Subject:** Re: Draft Limiting Instruction re non-witness appearance

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

No.

## Robert Anthony Alvarez, Sr.

Founding Member, Avanti Law Group PLLC



Phone (616) 257-6807 Mobile (616) 886-1125

Email ralvarez@avantilaw.com Address WYOMING: 600 28th St. SW



Attorneys. Counselors. Litigators.

On Fri, May 30, 2025, 7:49 AM Jessica Mugler < imugler@bsfllp.com > wrote:

Robert,

Here is what we will propose to the Court. Do you have any objection?

During the testimony of Luis Gomez-Echeverria, you heard questioning about another person in the courtroom that he had a previous relationship with. You may not consider that evidence for anything other than its influence on the witness's demeanor and his ability to testify free of outside influences.

Jessica Mugler

Associate

## BOIES SCHILLER FLEXNER LLP

1401 New York Avenue, N.W.

Washington, DC 20005

(c) +1 636-697-6497

(d) +1 202-274-1169

jmugler@bsfllp.com

www.bsfllp.com

From: Robert Anthony Alvarez < ralvarez@avantilaw.com >

Sent: Friday, May 30, 2025 7:15 AM
To: Kenya K. Davis <kdavis@bsfllp.com>

**Cc:** Kat D <<u>katlynnedahl@gmail.com</u>>; Jessica Mugler <jmugler@BSFLLP.com>; Teresa Hendricks

<thendricks@migrantlegalaid.org>

**Subject:** Re: Draft Limiting Instruction re non-witness appearance

**CAUTION**: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

I suggest she strikes that entire line of questioning and instructs the jury to completely disregard it altogether.

I'm not representing her in any capacity so I have no opinion either way.

Robert

## Robert Anthony Alvarez, Sr.

Founding Member, Avanti Law Group PLLC



Phone (616) 257-6807

Mobile (616) 886-1125

Email ralvarez@avantilaw.com

Address WYOMING: 600 28th St. SW

On Fri, May 30, 2025, 5:27 AM Kenya K. Davis < kdavis@bsfllp.com > wrote:

Good morning,

Do you have a draft limiting instruction to share with us? We should probably have that ready for the Court this morning.

I will note that it appears that Catalina would not be eligible to seek child support in the United States.

Let me know what you want to do so we can move expeditiously this morning.

Thanks,

Kenya

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1 08201831BSF]

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may contain information that, among other protections, is the subject of attorney-client privilege, attorney work product or exempt from disclosure under applicable law. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify the sender by replying to this electronic message and then deleting this electronic message from your computer. [v.1 08201831BSF]